

# Westchester County

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County Executive

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May 31, 2024

**VIA ECF**

Hon. Vincent L. Briccetti  
U.S. District Court, Southern District of New York  
Charles L. Brieant Jr. Federal Building & Courthouse  
300 Quarropas Street, Courtroom 630  
White Plains, New York 10601

Re: *White Plains Aviation Partners, LLC, d/b/a Million Air White Plains v. County of Westchester*, No. 21 Civ. 5312 (VB)

Dear Judge Briccetti:

The County of Westchester and White Plains Aviation Partners, LLC, d/b/a Million Air White Plains (“Million Air”), write jointly pursuant to Your Honor’s Order, dated May 22, 2024 (ECF No. 100), to update the Court regarding the status of their settlement discussions.

Since their last joint status submission on May 22, 2024 (ECF No. 99), the parties have continued to exchange revisions to an interim settlement agreement that would remove this case from the Court’s docket pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

The County has indicated its approval of the current draft of the interim settlement terms, and anticipates that Million Air, whose counsel has advised needs further time to review, will provide its approval of the draft by early next week. Accordingly, the parties respectfully request a continued stay in order to finalize the interim settlement agreement. If the stay is extended, the parties propose that they update the Court as to the status of their continued negotiations on or before June 7, 2024.

The parties thank the Court for its consideration of their request.

Respectfully submitted,

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